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11 W. BRADLEY ELECTRIC, INC.

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re

16 PG&E CORPORATION, INC,
17 Debtor in Possession.

Chapter 11

Case No. 19-30088 (DM)
(Lead Case)

18 In re

19 PACIFIC GAS AND ELECTRIC
20 COMPANY,
21 Debtor in Possession.

(Jointly Administered)

**SECOND¹ NOTICE OF CONTINUED
PERFECTION OF MECHANICS
LIENS UNDER 11 U.S.C. § 546(b)(2)**

☐ Affects PG&E Corporation

☒ Affects Pacific Gas and Electric
Company

☐ Affects both Debtors

* All papers shall be filed in the Lead
Case, No. 19-30088 (DM)

22 NOTICE IS HEREBY GIVEN that W. BRADLEY ELECTRIC, INC. ("WBE"),
23 is a party under a certain pre-petition contract with Pacific Gas and Electric Company
24 ("PG&E") and a subcontractor under certain pre-petition agreements with Roebbelen
25 Contracting, Inc. and CB2 Builders, Inc., respectively, which entities were or are general
26 contractors under certain related general contract agreements with PG&E (collectively, "WBE
27 Contracts"), including but not limited to PG&E's agreements with the respective referenced
28 _____

¹ A notice of continued perfection of mechanics liens was filed by the same creditor at Docket No. 1664.

1 general contractors as specified in Schedule G in this case [Docket No. 907], as such
2 subcontracts and general contracts may have been amended and restated or otherwise modified
3 or supplemented from time to time. Under the WBE Contracts, WBE provided certain
4 electrical, HVAC, sitework, interior upgrades and related services at PG&E facilities and
5 properties throughout Northern California (collectively, the “Properties”) to the benefit of
6 PG&E. The total value of the WBE Contracts attached to the Properties as of March 21, 2019
7 was **\$554,246.11**.

8 Pursuant to California Civil Code § 8460, an action to enforce a mechanics lien must be
9 commenced within 90 days after recordation of the claim of lien. However, due to the automatic
10 stay herein, WBE is precluded from filing a state court action to enforce its liens. Under 11
11 U.S.C. § 546(b)(2), when applicable law requires seizure of property or commencement of an
12 action to perfect, maintain or continue the perfection of an interest in property, and the property
13 has not been seized or an action has not been commenced before the bankruptcy petition date,
14 the claimant shall instead file a notice in bankruptcy court within the time fixed by law for
15 seizing the property or commencing an action. 11 U.S.C. § 546(b)(2); see also In re Baldwin
16 Builders, 232 B.R. 406, 410-411 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101
17 Cal.App. 4th 26, 41 (2002).

18 Under California Civ. Code §§ 8050(a) and 8412, WBE is entitled to assert and hereby
19 does assert its lien rights and under 11 U.S.C. § 546(b) and gives this Notice in lieu of the
20 commencement of any action to perfect, maintain or continue WBE’s liens. WBE requests
21 adequate protection of said liens. True and correct copies of each of WBE’s liens, recorded and
22 filed against the Properties in each respective California county, are attached hereto as
23 **EXHIBIT A** and further identified therein as Exhibit A-1 thru Exhibit A-6, together with a
24 summary of said liens. The outstanding amount due under these six (6) lien projects currently
25 totals not less than \$106,583.07 (altogether, the “WBE Liens”).

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1 WHEREFORE, WBE asserts secured interests in the Properties as reflected by the WBE
2 Liens to the fullest extent allowed by applicable law, including interest and attorneys' fees.
3 Further, WBE reserves all rights to supplement and/or amend this Notice, and reserves any and
4 all other rights under applicable law.

5 DATED: June 18, 2019

ELKINGTON SHEPHERD LLP

6 By: /s/ James A. Shepherd

7 Attorneys for Creditor-Lienholder
8 W. BRADLEY ELECTRIC, INC.